

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**In re: TAMARA SUE CREWS,
Debtor.**

Case No. 14-35243-KLP
Chapter 13
Trustee: Bates

AFFIDAVIT

COMES NOW, Tamara Sue Crews (the "Debtor"), and, having been properly sworn, states as follows:

The Debtor previously filed one (1) Chapter 13 bankruptcy case: Case No. 12-31264 (hereinafter "prior case"), filed on February 29, 2012, and dismissed on September 18, 2014, for failure to make plan payments. The prior case was pending within one (1) year of the filing of the instant case, thus triggering the provision of 11 U.S.C. §362(c)(3).

In the prior case, the Debtor filed in good faith but fell behind in her Chapter 13 Plan ("Plan") payments when her mother passed away. Unfortunately, the Debtor's mother did not have a life insurance or burial policy, so the Debtor was forced to pay for her mother's funeral on her own. The Debtor could not afford to make her Plan payments while paying for her mother's funeral, and she fell too far behind to catch up her payments. The Debtor also incurred additional medical debt during the prior case, and she was unable to pay that debt outside the bankruptcy. In order to include and pay back her post-petition medical debt and prior creditors, it was in the Debtor's best interests to re-file a Chapter 13 bankruptcy.

In the instant case, the Debtor proposes a Plan that commits all of her disposable income to pay the Trustee for a period of fifty-five (55) months. The Plan proposes a good faith repayment to non-priority unsecured creditors of 19.07% of approximately \$53,340.91 (as well as full repayment of approximately \$4,789.00 to priority unsecured creditors). The Debtor believes she will be able to successfully make her Plan payments, and complete the Plan and receive her discharge.

I, Tamara Sue Crews, swear and affirm to all that is written above. I believe that I will be able to make all of my payments and complete my Plan, and I need the bankruptcy system's protection while I do so. I respectfully ask that the Court grant my Motion and extend the automatic stay in my case.

FURTHER the affiant sayeth not.

/s/ Tamara Sue Crews
Tamara Sue Crews

10/21/14
Date

**State of VIRGINIA
County of CHESTERFIELD**

Having been sworn, the above statement was made and signed before me this 21st day of October 2014 by Tamara Sue Crews.

/s/ Yolanda Dial Currence
Yolanda Dial Currence, Reg. No. 7310951
My Commission expires: 12/31/2014